

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

**SOCIAL POSITIONING INPUT
SYSTEMS, LLC,**

Plaintiff,

vs.

**RAPIDSOFT SYSTEMS, INC. d/b/a
FIELD FORCE TRACKER,**

Defendant.

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Case No: 3:21-CV-11630-FLW-TJB

PATENT CASE

**PLAINTIFF’S ANSWERS AND DEFENSES TO
DEFENDANT’S COUNTERCLAIMS**

Now comes Plaintiff, Social Positioning Input Systems, LLC (“Plaintiff,” “Counterclaim Defendant,” or “SPIS”), by and through undersigned counsel, pursuant to Federal Rules of Civil Procedure 12, without admission of the legal sufficiency thereof and responding only to the factual allegations therein, and states as follows for its Answer and Defenses to Defendant and Counter Plaintiff Rapidsoft Systems, Inc. d/b/a Field Force Tracker (“Defendant,” “Counterclaim Plaintiff,” or “RSI”) Counterclaims [Doc. 18] (hereafter the “Counterclaims”) as follows:

PARTIES

1. SPIS has insufficient knowledge of the allegations contained in paragraph 1 and therefore denies same.

2. Admitted.

JURISDICTION

3. SPIS incorporates by reference each of its answers in paragraphs 1-2 above.

4. Admitted.

5. SPIS admits that an actual cause and controversy exists concerning infringement of

the '365 Patent. SPIS denies any remaining allegations contained in paragraph 5.

6. Admitted.

7. Admitted.

8. Admitted.

9. Admitted.

10. SPIS admits that an actual controversy exists concerning infringement of the '365 Patent. SPIS denies any remaining allegations contained in paragraph 10.

COUNT I

11. SPIS incorporates by reference each of its answers in paragraphs 1-10 above.

12. Denied.

13. Denied.

14. SPIS admits that RSI seeks a declaratory judgment. SPIS denies any remaining allegations contained in paragraph 14.

15. Denied.

COUNT II

16. SPIS incorporates by reference each of its answers in paragraphs 1-15 above.

17. Denied.

18. Denied.

19. Denied.

20. SPIS admits that RSI seeks a declaratory judgment. SPIS denies any remaining allegations contained in paragraph 20.

21. Denied.

PRAYER FOR RELIEF

To the extent a response is required, SPIS denies that RSI is entitled to any of the relief requested.

Dated: October 27, 2021.

Respectfully submitted,

/s/ Mark A. Kriegel

MARK KRIEGEL

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was filed electronically on October 27, 2021, and was served via CM/ECF on all counsel who are deemed to have consented to electronic service.

/s/ Mark A. Kriegel

MARK KRIEGEL